

## Re: Marrow v. City

David Thompson

Tue 10/11/2016 2:23 PM

To:Johnson, Tichina <tljohnson@ci.mount-vernon.ny.us>;

Cc:Puma, CherylInn <CPuma@ci.mount-vernon.ny.us>;

✉ 1 attachments (2 MB)

2016-09-09 Email Corey Marrow v. City of Mount Vernon, et al.pdf;

Actually, what I sent you on September 9, 2016 contained two deposition notices for today, and two for tomorrow (see copy attached). I sent a hard copy by first class mail. This wouldn't be the first time the dog ate something I sent to your office in paper form, which is why I also send everything by email.

Please let me know a date certain when you will provide the discovery responses.

As I mentioned in my voicemail, I am assuming that your witnesses are not attending their noticed depositions tomorrow. If that is incorrect, please let me know and I will schedule the court reporter. I will have to leave the depositions open, however, since I do not yet have any paper discovery from you.

David Thompson  
Stecklow & Thompson  
217 Centre Street, 6th Floor  
New York, N.Y. 10013  
Phone: (212) 566-8000  
Fax: (212) 202-4952

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**From:** Johnson, Tichina <tljohnson@ci.mount-vernon.ny.us>

**Sent:** Tuesday, October 11, 2016 10:07 AM

**To:** David Thompson

**Cc:** Puma, CherylInn

**Subject:** RE: Marrow v. City

Also, in reviewing your initial demands, you have the EBT scheduled for the 12th. Your Friday emails which I am just receiving now notice the EBT for today, the 11th.

Please give me a call ASAP to discuss.

Thanks,  
Tichina

Tichina L. Johnson  
Assistant Corporation Counsel  
Law Department  
City of Mount Vernon

Phone: 914-665-2371

Fax: 914-665-9142

Email: tljohnson@cmvny.com

"The City of Hope"

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From: Johnson, Tichina

Sent: Tuesday, October 11, 2016 10:02 AM

To: David Thompson

Cc: Puma, Cherylnn

Subject: RE: Marrow v. City

David,

I just got your email. I knew you sent discovery demands, but I did not notice anything regarding an EBT. Also, I am working on the discovery. The office was closed yesterday, so I did not know about this supposed EBT. I get my emails, but I prefer if you also send the documents via mail.

Tichina L. Johnson  
Assistant Corporation Counsel  
Law Department  
City of Mount Vernon  
Phone: 914-665-2371  
Fax: 914-665-9142  
Email: tljohnson@cmvny.com  
"The City of Hope"

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From: David Thompson [dthompson@SCTLaw.NYC]

Sent: Monday, October 10, 2016 3:40 PM

To: Johnson, Tichina; Johnson, Tichina

Subject: Re: Marrow v. City

I have not heard from you concerning whether your witnesses will appear at my office for their noticed depositions. Please let me know asap whether I should cancel the court reporter for tomorrow or not. Please note that, in my voice mail message, I erroneously stated that the first deposition was Wednesday. As the attached notices state, the first depositions are scheduled for tomorrow.

David Thompson  
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217 Centre Street, 6th Floor  
New York, N.Y. 10013  
Phone: (212) 566-8000  
Fax: (212) 202-4952

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From: David Thompson

Sent: Friday, October 07, 2016 8:55 PM

To: tljohnson@cmvny.com; tljohnson@ci.mount-vernon.ny.us

Subject: Marrow v. City

Hi:

Please see the attached letter and deposition notice.

Regards,

David Thompson  
Stecklow & Thompson  
217 Centre Street, 6th Floor  
New York, N.Y. 10013  
Phone: (212) 566-8000  
Fax: (212) 202-4952